

April 11, 2012

Assemblyman Marty Block, Chairman  
Assembly Higher Education Committee  
State Capitol, Room 3091  
Sacramento, CA 95814

**RE: OPPOSE AB 2296 (BLOCK), as amended April 9, 2012**

Dear Chairman Block,

On behalf of the California Association of Private Postsecondary Schools (CAPPS), we write to voice our strong concerns about your recently amended AB 2296.

CAPPS is the leading statewide organization for the Private Postsecondary sector representing approximately 250 schools in California. CAPPS diverse membership includes over 200 accredited institutions, as well as some approved schools.

We are sure you are aware that the California Private Postsecondary Education Act of 2009, authored by Assembly Member Portantino, was very carefully written and just last year fully implemented via a thorough regulatory process. Unfortunately, your amendments make some sweeping changes that will make it very difficult for schools to comply and we question what benefit, if any, the student will gain from this proposal.

For instance, on page 5 (lines 11-27) and later on page 9 (lines 21-38) the bill calls for various disclosures for approved schools offering certain degrees. While CAPPS was neutral on your previous version of the bill, these amendments go too far and in the end will be impossible to comply with and will not benefit the student. Requiring schools to disclose "all known" limitations of a degree IN ALL 50 STATES is unrealistic and will only set up a school for failure and eventual lawsuits and/or government sanctions. Furthermore, even if this was possible a schools' disclosure would end up being hundreds of pages long and do nothing to help the student.

Later on page 10 (lines 32-39) and page 11 (lines 1-2) the bill changes how all schools regulated by the Bureau would report salary and wage information. Instead of relying on existing law and established government data, your bill creates a vague process that will rely on multiple, undefined government agencies. We don't understand why this change is necessary and what it would do to help students.

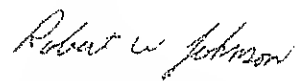
Your bill also would require Federal three year default rates to be listed under the Student Performance Fact Sheet, yet this data is not related to either Student performance or Institutional performance. Three years rates are a complex repayment provision relating to

student loans about whether the student has made a payment on their student loans years after they have graduated from the Institution.

Finally, your proposal would amend the current, negotiated definition of "graduates employed in the field." Introducing a new 13 week requirement, 17.5 hour requirement and 32 hour requirement, is excessive, and destroys the existing regulatory plan for no stated benefit.

For the reasons stated above, and others, we respectfully oppose AB 2296. We look forward to discussing our concerns in more detail. Please feel free to contact myself or our advocate, Matt Back at Ackler & Associates at 916-556-1234.

Respectfully,



Robert Johnson  
CAPPS Executive Director

CC: Members, Assembly Higher Education Committee  
Laura Metune, Consultant, Assembly Higher Education Committee  
Ted Blanchard, Assembly Republican Caucus Consultant  
Matt Back, Ackler & Associates